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E-filed 6/5/06

Attorneys for the Redback Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE:)	CASE NO.: C-03-5642 JF (HRL)
)	
REDBACK NETWORKS, INC. SECURITIES)	STIPULATION AND [PROPOSED]
LITIGATION.)	ORDER REGARDING BRIEFING
)	SCHEDULE AND CASE
)	MANAGEMENT CONFERENCE

This Document Relates to:

ALL ACTIONS.

STIPULATION

WHEREAS, on March 20, 2006, the Court entered an Order dismissing plaintiff's third amended consolidated complaint and granting plaintiff leave to amend (the "Order");

WHEREAS, pursuant to the Order, plaintiff's fourth amended consolidated complaint was filed on May 19, 2006;

WHEREAS, a Case Management Conference has been scheduled for July 21, 2006 at 10:30 a.m.;

WHEREAS, the parties have met and conferred regarding the scheduling of the defendants' responses to the fourth amended consolidated complaint; and

WHEREAS, the parties have agreed to reschedule the Case Management Conference to coincide with the hearing on defendants' motions to dismiss;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, subject to approval of the Court, that:

1. Defendants shall have until and including July 7, 2006 to serve and file any motions to dismiss plaintiff's fourth amended consolidated complaint.

2. Plaintiff shall have until and including August 4, 2006 to serve and file any oppositions to defendants' motions to dismiss.

3. Defendants shall have until and including August 25, 2006 to serve and file any replies in support of their motions to dismiss.

4. Defendants' motions to dismiss shall be heard on September 15, 2006 at 9:00 a.m., or such other date and time as the Court deems appropriate.

5. The Case Management Conference shall be continued to coincide with the hearing on defendants' motions to dismiss.

1 Dated: June 1, 2006

WILSON SONSINI GOODRICH & ROSATI
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2
3 By: /s/ Kristin A. Dillehay

4 Terry T. Johnson
5 Steven D. Guggenheim
6 Kristin A. Dillehay
7 Cameron P. Hoffman
8 Mark T. Oakes

Attorneys for the Redback Defendants

9 Dated: June 1, 2006

GRANT & EISENHOFER P.A.

10 By: /s/ Lauren E. Wagner

11 Stuart M. Grant
12 John C. Kairis
13 Lauren E. Wagner
14 Kimberly L. Wierzel

Attorneys for Lead Plaintiff

15 Dated: June 1, 2006

CRAVATH, SWAINE & MOORE LLP

16 By: /s/ Thomas G. Rafferty

17 Rowan D. Wilson
18 Thomas G. Rafferty

Attorneys for Defendant PricewaterhouseCoopers
LLP


[PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing:

1. Defendants' shall have until and including July 7, 2006 to serve and file any motions to dismiss plaintiff's fourth amended consolidated complaint.
2. Plaintiff shall have until and including August 4, 2006 to serve and file any oppositions to defendants' motions to dismiss.
3. Defendants shall have until and including August 25, 2006 to serve and file any replies in support of their motions to dismiss.
4. Defendants' motions to dismiss shall be heard on September 15, 2006 at 9:00 a.m.
5. The Case Management Conference is rescheduled to coincide with the hearing on defendants' motions to dismiss.

IT IS SO ORDERED.

Dated: 6/2/06



THE HONORABLE JEREMY FOGEL
United States District Judge

1 I, Kristin A. Dillehay, am the ECF User whose identification and password are being
2 used to file this Stipulation and [Proposed] Order Regarding Briefing Schedule and Case
3 Management Conference. In compliance with General Order 45.X.B, I hereby attest that Lauren
4 E. Wagner and Thomas G. Rafferty have concurred in this filing.

5 Dated: June 1, 2006

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

7 By: /s/ Kristin A. Dillehay
Kristin A. Dillehay

Attorneys for the Redback Defendants